

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

PATRICIA A. DOUGHERTY, Debtor

Case No. 20-11193

Chapter 13

OBJECTION TO POSTPETITION CLAIM
OF WELLS FARGO BANK, N.A.

Debtor, Patricia A. Dougherty, by and through her attorney, Richard J. Gromen, Jr., Esquire, hereby objects to the post petition Claim of Wells Fargo Bank, N.A., and in support thereof, states the following:

1. Wells Fargo Bank filed a Notice of Postpetition Mortgage Fees, Expenses and Charges on October 27, 2020, claiming unpaid trash charges to the Borough of Manheim in the amount of \$15,746.73.

2. Wells Fargo Bank claims postpetition charges being due for trash services, however, failed to attach any documentation to establish the validity of the debt.

3. A Proof of Claim was previously filed by the Borough of Manheim for trash services. Objections were filed and an Amended Proof of Claim was filed in the amount of \$7,219.49. Debtor's confirmed Chapter 13 Plan provides for the payment of all services to the Borough.

4. There are no postpetition charges due for trash to the Borough of Manheim or any third parties.

WHEREFORE, the Debtor, Patricia A. Dougherty, respectfully requests that the Postpetition Claim filed by Wells Fargo Bank be dismissed.

Respectfully submitted,

Dated: November 6, 2020

/s/ Richard J. Gromen, Jr.

RICHARD J. GROMEN, JR., ESQUIRE

Attorney for Debtor

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